

FILED

MAR 26 2021

UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

Yetem Nicodimos

728 Alabama street

Suite 310

San Francisco, CA 94110

Mach 19, 2021

Keller Benvenuti Kim LLP

Tobias S. Keller

Peter J. Benvenuti

Jane Kim

650 California Street

Suite 1900

San Francisco, CA 94108

Re: PG&E Corporation and
Pacific Gas and Electric Company

United States Bankruptcy Court

Northern District of California

San Francisco Division

Honorable Dennis Montali, United States Bankruptcy Judge

Courtroom 17, 16th Floor

450 Golden Gate Avenue

Mail Box 36099

San Francisco, CA 94102

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

This letter is to serve as my opposition of the disallowance of my objected-to proof of claim. Enclosed is a copy of notice received.

The name of bankruptcy court: United States Bankruptcy Court, Northern District of California, San Francisco Division.

The name of the Recognized Debtor: Keller Benvenuti Kim LLP Tobias S. Keller (#151445) Perter J. Benvenuti (#60566) Jane Kim (#298192) 650 California Street, Suite 1900 San Francisco, CA 94108

The case number: Bankruptcy Case No. 19-30088 (DM)

Title of Ominbus Objection: Chapter 11 Cases - Notice of the reorganized Debtors' sixty third Omnibus objection to claims (satisfied claims).

Creditor name: Yetem Nicodimos, Waterbar Restaurant

Claim scheduled to be disallowed and expunged: 87107

Debtor: PG&E

Date filed: 10/28/2019

Total amount: \$500

The court should not disallow this claim because I lost my ability to earn my wages due to the negligence caused by PG&E. At my place of work - Waterbar Restaurant located at 399 Embarcadero in San Francisco - PG&E cut off power to the building at three different occasions within that year. When the power is cut off our business shuts down and we are sent home unable to earn income. The first time this happened I filed a claim with PG&E with supporting documents and was able to get reimbursed. This time however, PG&E denied my claim without explanation. This last claim was filed around the same time as

the fire victim claims, perhaps PG&E mistakenly saw my claim as a fire victim claim. I am asking the Court should not sustain the Omnibus Objection as PG&E caused me to lose my ability to earn wages on three separate occasions. I was reimbursed by PG&E only for the first lost wage.

Affidavit of Ethan Shulman March 19, 2021

My name is Ethan Shulman I here by affirm as follows: PG&E shut off power at Waterbar Restaurant located at 399 Embarcadero San Francisco, on three different occasions. The business had to close due to lack of power. All employees were sent home without wages. The employees who filed a claim with PG&E for the first power outage were reimbursed by PG&E including Yetem Nicodimos. The last claim #87107 filed on 10/28/2019 by Yetem Nicodimos was denied by PG&E without an explanation.

I swear under penalty of perjury that the information I have provided is true and accurate to the best of my knowledge, information and belief.

Name of Creditor:


Yetem Nicodimos - Waterbar Restaurant

728 Alabama street

Suit 301

San Francisco, CA 94110

415-706-6379


Yetem Nicodimos
3/19/2021

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Attorneys for Debtors and Reorganized Debtors

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

**UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
 COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED
 DEBTORS' SIXTY-THIRD OMNIBUS
 OBJECTION TO CLAIMS (SATISFIED
 CLAIMS)**

**Response Deadline:
 March 24, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: April 7, 2021
 Time: 10:00 a.m. (Pacific Time)
 Place: (Telephonic Appearances Only)
 United States Bankruptcy Court
 Courtroom 17, 16th Floor
 San Francisco, CA 94102

Creditor Name: Waterbar Restaurant-Nicodimos, Yetem

Objected-To Claim(s)								Basis for Objection
Claim/ Schedule to be Disallowed and Expunged	Debtor	Date Filed / Scheduled	Secured	Admin	Priority	General Unsecured	Total Amount	
87107	PG&E Corporation	10/28/2019	\$0.00	\$0.00	\$0.00	\$500.00	\$500.00	Other Satisfied

On February 25, 2021, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “Debtors,” or as reorganized pursuant to the Plan, the “Reorganized Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), filed their *Sixty-Third Omnibus Objection to Claims (Satisfied Claims)* (the “Omnibus Objection”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “Bankruptcy Court”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by March 24, 2021 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

April 7, 2021 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Fifth Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective March 1, 2021 and until otherwise ordered, **all hearings shall be conducted by video or teleconference. The Courtroom will be closed.** All interested parties should consult the Bankruptcy Court’s website at www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

These Omnibus Claims Objection Procedures **DO NOT APPLY** to any proofs of claim with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.

1 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
2 Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined
3 therein) listed above as "Objected-To Claim(s)" on the grounds that the designated Proof(s) of Claim
4 has been satisfied or released during or prior to these Chapter 11 Cases in accordance with the
5 Bankruptcy Code, any applicable rules, or Court orders.

6 If you do **NOT** oppose the disallowance of your Objected-To Proof(s) of Claim listed above,
7 then you do NOT need to file a written Response to this Omnibus Objection and you do NOT need to
8 appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be disallowed.

9 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your
10 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a "**Response**"), in
11 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
12 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on March 24,**
13 **2021 (the "Response Deadline"):** You must file the Response through the Court's electronic case
14 filing ("ECF") system if you have access to the ECF system; service on the Reorganized Debtors'
15 Counsel will occur automatically upon ECF filing; and no separate service of your Response is
16 required. If you do NOT have access to the ECF system, service must be made by electronic mail to
17 the Reorganized Debtors' counsel at PGEclaims@kbkllp.com, and you must arrange for the Response
18 to be filed with the Court within two business days thereafter. If you do not have the ability to serve a
19 Response electronically, the Response must be served by mail, express or some other means so either
20 (a) it is actually received by the Reorganized Debtors' Counsel by the Response Deadline, or (b) it is
21 dispatched not later than the Response Deadline through a postal or commercial express service that
22 will make actual delivery not more than two business days after the Response Deadline, and in that
23 case the Claimant must inform the Reorganized Debtors' counsel by email, telephone or facsimile
24 before the Response Deadline of the Claimant's name and phone number, the number of the Omnibus
25 Objection, and the fact that a paper Response is being delivered by express.

26 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
27 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
28 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
and/or the name, address, and telephone number of your attorney and/or designated representative to
whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the
name, address, telephone number, and email address of the party with authority to reconcile, settle, or
otherwise resolve the Omnibus Objection on your behalf, if any.

29 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
30 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
31 later date. You will receive a separate notice of any such objection.

32 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
33 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
34 (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account
35 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim
36 agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,

1 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
2 request a complete copy of the Omnibus Objection, including all Exhibits.

3 Dated: February 25, 2021

KELLER BENVENUTTI KIM LLP

/s/ Dara L. Silveira

Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors

FOR DOMESTIC AND INTERNATIONAL USE

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FLAT RATE ENVELOPE RECEIVED ONE RATE ■ ANY WEIGHT

2021

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